In Re Holocaust Victim Assets Litigation regarding the Application of Bu...uborne for counsel fees Doc. 55

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

IN RE HOLOCAUST VICTIM ASSETS LITIGATION	)))))))	Master Docket No. CV-96-4849 (ERK) (MDG) CV-06-983 (ERK)

FOURTH SUPPLEMENTAL DECLARATION OF MORRIS A. RATNER REGARDING FEES AND COSTS INCURRED IN CONNECTION WITH SETTLEMENT IMPLEMENTATION

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I, MORRIS A. RATNER, declare as follows:

1. I am admitted to Bar of the state courts of California and New York, and to the Washington, D.C. Bar. I am an attorney with and a member of the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP ("Lieff, Cabraser") in San Francisco, California and New York City, New York. Lieff, Cabraser is one of the Court appointed Settlement Class Counsel in this case. I am competent to testify in court. All statements herein are based upon personal knowledge. I am familiar with the facts of this case, as set forth herein; I was personally involved in this litigation from its inception, and have participated in all phases of the case.

2. Attached hereto as Exhibit A is a summary of Lieff, Cabraser's lodestar incurred since July 10, 2002, by timekeeper, listing the current billing rate for each timekeeper.

3. Attached hereto as Exhibit B is a detailed daily time entry log supporting the lodestar summary, showing the work performed by each timekeeper for all hours billed since July 10, 2002.

4. Lieff, Cabraser's reported time as reflected in Exhibits A and B dramatically understates actual time invested by Lieff, Cabraser in settlement implementation since July 10, 2002 because the primary attorney working on settlement implementation issues – Lieff, Cabraser partner Morris Ratner – did not routinely record time spent on telephone calls with either Lead Settlement Class Counsel Burt Neuborne or the Special Masters where the subjects of conversation did not require further follow up by Lieff, Cabraser associates or staff.

5. Attached hereto as Exhibit C is a summary by category of costs of Lieff, Cabraser's post-July 10, 2002 costs incurred in connection with settlement implementation. Invoices supporting each of the cost items are available at the Court's request. Most of the costs were incurred in connection with supporting Lead Settlement Class Counsel Burt Neuborne in

connection with his leadership on various settlement implementation-related issues, and in the course of filing and serving various pleadings since July 10, 2002.

6. If the Court grants Lieff, Cabraser's application for an award of fees, it is the intention of my firm to supplement our prior donation of fees to Columbia University Law School, to enhance the endowment of the clinical human rights chair we created as a result of the Court's order awarding our original fee in this case. Lieff, Cabraser will keep any cost reimbursement ordered by the Court to cover expenses incurred since July 10, 2002.

I declare under penalty of perjury under the laws of the States of California and New York that the foregoing answers are true and correct. Executed in New York, New York.

Dated: March 15, 2006

Morris A. Ratner

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

Report created on **03/14/2006 03:47:51 PM**

From **07/11/2002**
To **Present**

Matter Number: 0556-0001 SWISS BANKS - General Matter

PARTNER

NAME	HOURS	RATE	TOTAL
ELIZABETH CABRASER	0.90	750.00	675.00
MORRIS RATNER	150.90	575.00	86,767.50
LISA LEEBOVE	2.00	475.00	950.00
	153.80		**88,392.50**

ASSOCIATE

NAME	HOURS	RATE	TOTAL
CARYN BECKER	41.30	320.00	13,216.00
	41.30		**13,216.00**

LAW CLERK

NAME	HOURS	RATE	TOTAL
JUNE SHIH	20.20	220.00	4,444.00
ALLISON ELGART	13.30	220.00	2,926.00
	33.50		**7,370.00**

PARALEGAL

NAME	HOURS	RATE	TOTAL
DAWN BEHRMANN	0.20	190.00	38.00
JOY HAYNES	0.20	170.00	34.00
JOANNA ROSEN	8.80	160.00	1,408.00
MARTINE TARIOT	1.40	180.00	252.00
THOMAS HOPKINS	4.30	210.00	903.00
	14.90		**2,635.00**

	HOURS		TOTAL
MATTER TOTALS	**243.50**		**111,613.50**

EXHIBIT A

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

Report created on **03/14/2006 03:47:08 PM** **From** **07/11/2002**

Timekeeper: ALL **To** **Present**

0556-0001 SWISS BANKS - General Matter

Date	Timekeeper	Narrative	Hours	Task Code
7/11/2002	RATNER, MORRIS	File supplemental petition.	0.20	
7/22/2002	RATNER, MORRIS	File notice of entry of orders.	0.40	
7/23/2002	BECKER, CARYN	Research on interest issue.	1.00	
7/23/2002	CABRASER, ELIZABETH	Telephone conferences with M. Ratner re issues/procedure for stipends to common benefit persons.	0.50	
7/23/2002	RATNER, MORRIS	Telephone conference with Burt Neuborne re interest issue and incentive awards.	0.50	
7/23/2002	RATNER, MORRIS	Telephone conference with Shari Reign and others re various.	1.00	
7/24/2002	BECKER, CARYN	Communicate with M. Ratner re briefing.	0.40	
7/24/2002	CABRASER, ELIZABETH	Telephone conferences with M. Ratner re additional distribution/allocation issues.	0.40	
7/24/2002	RATNER, MORRIS	Telephone conference with Burt Neuborne; memo re same; conference with C. Becker re same - interest issues.	2.90	
7/25/2002	RATNER, MORRIS	Conference with H. Tamen re experts; conference with Burt Neuborne re same; conference with M.H. office and with R. Swift re affidavits.	1.50	
7/26/2002	RATNER, MORRIS	Conference with co-counsel re declarations; conference with H. Tamen; call Weiss; edits to Swift.	3.00	
7/30/2002	RATNER, MORRIS	Draft interest brief.	2.50	
7/30/2002	RATNER, MORRIS	Serve order of court; conference with Burt Neuborne re briefing.	2.00	
7/31/2002	RATNER, MORRIS	Conference with H. Tamen re expert; conference with Mel's office re declaration; draft Aug. 9 memo on interest.,	5.00	
8/1/2002	BECKER, CARYN	Research re contract interpretation.	1.00	
8/1/2002	RATNER, MORRIS	Conference with Mel Weiss; conference with Burt Neuborne; edit documents on interest.	3.00	
8/2/2002	BECKER, CARYN	Research re interest.	6.00	
8/2/2002	RATNER, MORRIS	Conference with Walter Werner; put together materials for same.	4.00	
8/3/2002	RATNER, MORRIS	Review C. Becker memo re ambiguous contracts; voicemail to C. Becker.	3.00	
8/4/2002	BECKER, CARYN	Research re contract interpretation for interest motion.	1.10	
8/4/2002	RATNER, MORRIS	Draft motion re interest; research re same.	4.50	
8/5/2002	BECKER, CARYN	Telephone conference with H. Tamen re interest issue; communicate with M. Ratner; research re estoppel in contract cases.	3.20	
8/5/2002	RATNER, MORRIS	Continue drafting interest motion; conference with Weiner; conference with Burt Neuborne; conference with Weiss; conference with Werner; conference with Tamen.	4.80	
8/6/2002	RATNER, MORRIS	Edit Burt affidavit; conference with Burt Neuborne re same; conference with Tunick re affidavit; meet with Tunick; review Burt Neuborne declaration draft; conference with Werner; edit brief.	4.00	
8/7/2002	HOPKINS, THOMAS	Cite check, prepare fax, make edits to memo, communicate with M. Ratner	2.10	
8/7/2002	RATNER, MORRIS	Telephone conference with Werner; telephone conference with Burt Neuborne; finalize memo to law re interest.	7.00	
8/8/2002	HOPKINS, THOMAS	Communicate with M. Ratner, cite check, prepare fax	2.20	
8/8/2002	RATNER, MORRIS	Finalize brief.	5.90	

EXHIBIT B

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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Timekeeper: ALL **To** **Present**

0556-0001 SWISS BANKS - General Matter

Date	Timekeeper	Narrative	Hours	Task Code
8/9/2002	RATNER, MORRIS	File interest motion; extra research re same.	3.50	
8/11/2002	RATNER, MORRIS	Draft supplemental to Block re interest.	3.00	
8/12/2002	RATNER, MORRIS	Edit Block letter; review cases; telephone conference with Burt Neuborne.	1.00	
8/13/2002	RATNER, MORRIS	Review revised interest declaration re Burt Neuborne; finalize.	3.00	
8/14/2002	BECKER, CARYN	Communicate with S. Reig re service list.	0.20	
8/14/2002	RATNER, MORRIS	File supplemental Neuborne declaration and letter.	0.40	
8/22/2002	RATNER, MORRIS	File Neuborne declaration re supplemental distribution; conference with Burt Neuborne re same.	1.50	
9/17/2002	RATNER, MORRIS	Revise order to court.	0.30	
9/18/2002	RATNER, MORRIS	Notice of entry of order.	0.10	
9/20/2002	RATNER, MORRIS	Review CRT insurance inquiry.	0.10	
10/8/2002	ROSEN, JOANNA	Locate Swiss documents	1.00	
10/9/2002	RATNER, MORRIS	Conference with C. Becker re research on Slave Labor II; draft stipulation on amendment re interest.	1.50	
10/10/2002	BECKER, CARYN	Communicate with M. Ratner re brief.	0.30	
10/14/2002	BECKER, CARYN	Assist with declaration re Slave Labor II.	0.40	
10/14/2002	RATNER, MORRIS	Burt Neuborne's declaration; conference with M. Hausfeld; conference with Swift.	0.50	
10/15/2002	ROSEN, JOANNA	Swiss documents	1.00	
10/16/2002	RATNER, MORRIS	Conference with Hausfeld re Slave Labor II declaration; conference with Burt Neuborne re same.	0.30	
10/16/2002	ROSEN, JOANNA	Holocaust documents, pull from storage, find orders	2.50	
10/17/2002	BECKER, CARYN	Communicate with J. Rosen re Swiss exhibits.	0.20	
10/17/2002	ROSEN, JOANNA	Copy exhibits	0.30	
10/17/2002	ROSEN, JOANNA	Pull documents	0.60	
10/17/2002	ROSEN, JOANNA	Pull exhibits	1.00	
10/17/2002	ROSEN, JOANNA	Swiss documents	0.30	
10/18/2002	HAYNES, JOY	Field calls; update database.	0.20	
10/18/2002	ROSEN, JOANNA	Locate documents	0.10	
10/21/2002	ROSEN, JOANNA	Find docket.	1.00	
10/22/2002	ROSEN, JOANNA	Email to claimant	0.50	
11/21/2002	ROSEN, JOANNA	Letters to claimaints	0.50	
12/4/2002	RATNER, MORRIS	Conference with Judge Korman; follow-up.	0.30	
1/17/2003	RATNER, MORRIS	Conference with M. Weiss re notice orders.	0.10	
1/20/2003	RATNER, MORRIS	Review orders; call M. Weiss re same.	1.00	

EXHIBIT B

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

Report created on **03/14/2006 03:47:08 PM** **From** **07/11/2002**

Timekeeper: ALL **To** **Present**

0556-0001 SWISS BANKS - General Matter

Date	Timekeeper	Narrative	Hours	Task Code
2/19/2003	RATNER, MORRIS	Email to Neuborne re notice; conference with paralegal re same.	0.40	
3/4/2003	RATNER, MORRIS	Conference with J. M. re notice; message to Hilsee re same.	0.50	
3/5/2003	RATNER, MORRIS	Conference with Hilsee re notice; conference with Reig re notice.	0.30	
3/9/2003	RATNER, MORRIS	Follow-up on notice issues.	1.50	
3/12/2003	RATNER, MORRIS	Conference with IOM and B. Neuborne re notice; email Kinsella and Hilsee.	0.50	
3/13/2003	RATNER, MORRIS	Conference with vendors re Phase III notice; conference with M. Bradley re deposited asset late claims; email to Burt Neuborne re same.	1.00	
3/14/2003	RATNER, MORRIS	Email to AB Data re Phase III notice.	0.10	
3/19/2003	BECKER, CARYN	Communicate with M. Ratner re Notice research.	0.50	
3/19/2003	RATNER, MORRIS	Conference with Heine; message to Burt Neuborne; conference with C. Becker re same.	0.40	
3/24/2003	BECKER, CARYN	Research re Notice.	0.70	
3/25/2003	BECKER, CARYN	Research re Notice.	6.00	
3/26/2003	BECKER, CARYN	Research; prepare legal insert for M. Ratner.	2.80	
3/27/2003	RATNER, MORRIS	Conference with Shari Reig and Judah Gribbetz; conference with Burt Neuborne; conference with IOM.	1.50	
3/28/2003	RATNER, MORRIS	Conference with IOM Sheryl re data on notice response.	0.50	
4/2/2003	RATNER, MORRIS	Circulate insurance update.	0.50	
4/10/2003	RATNER, MORRIS	Memo to court/Burt Neuborne.	1.00	
4/11/2003	RATNER, MORRIS	Burt Neuborne memo.	1.50	
4/13/2003	RATNER, MORRIS	Memo re notice.	2.80	
4/14/2003	BECKER, CARYN	Research for M. Ratner re prejudgment interest.	0.50	
4/15/2003	BECKER, CARYN	Memo to Burt Neuborne re Prejudgment Interest; email re same.	0.70	
4/16/2003	RATNER, MORRIS	Edit Hill declaration.	0.20	
4/17/2003	RATNER, MORRIS	Edit Hill declaration.	0.50	
4/22/2003	BECKER, CARYN	Communicate with Burt Neuborne re interest issues.	0.40	
4/22/2003	RATNER, MORRIS	Circulate final Hill declaration.	0.50	
4/25/2003	RATNER, MORRIS	Finish drafting notice memo for Burt Neuborne.	0.50	
4/26/2003	RATNER, MORRIS	Edit memo re notice.	2.00	
4/28/2003	RATNER, MORRIS	Draft notice memo.	1.00	
5/7/2003	RATNER, MORRIS	Edit notice memo.	3.80	
5/13/2003	RATNER, MORRIS	Finalize notice memo to Burt Neuborne.	3.00	
5/15/2003	RATNER, MORRIS	Conference with B. Neuborne re memo.	0.10	

EXHIBIT B

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0556-0001 SWISS BANKS - General Matter

Date	Timekeeper	Narrative	Hours	Task Code
5/16/2003	RATNER, MORRIS	Forward copy of memo to Reig.	0.10	
7/17/2003	RATNER, MORRIS	Note to Reig.	0.10	
7/18/2003	RATNER, MORRIS	Conference with J. Gribbetz.	0.20	
7/21/2003	BECKER, CARYN	Communicate with class member Lionel Salem re claims.	0.20	
7/23/2003	BECKER, CARYN	Communicate with S. Reig re general and claimant status; communicate with claimant.	1.00	
7/29/2003	RATNER, MORRIS	Memo for Gribbetz; conference with J. Gribbetz; conference with S. Reig by email.	1.00	
7/31/2003	RATNER, MORRIS	Mobil documents; Judah Gribbetz; conference with Burt Neuborne re various.	1.50	
8/1/2003	RATNER, MORRIS	Edit memo re cy pres notice.	1.00	
8/5/2003	RATNER, MORRIS	Finish memo re cy pres notice.	2.00	
8/6/2003	BECKER, CARYN	Communicate with S. Reig, P. Sak and M. Ratner re opt out issue.	0.30	
8/6/2003	RATNER, MORRIS	Conference with C. Becker re Jones Day query.	0.20	
8/7/2003	BECKER, CARYN	Communicate with P. Sak, S. Reig re claimant opt out issue.	0.50	
8/25/2003	TARIOT, MARTINE	Form letter to S. Aronson.	0.40	
8/26/2003	TARIOT, MARTINE	S. Aronson claim form email.	1.00	
8/28/2003	RATNER, MORRIS	Review Sturman letter; email to Sturman.	0.10	
9/16/2003	LEEBOVE, LISA	Telephone conference with I. Kasmer re claims conference.	0.30	
9/17/2003	LEEBOVE, LISA	Follow-up telephone conference with I. Kasmer re slave labor claim; draft letter to I. Kasmer and revise Power of Attorney; follow-up telephone conference with P. Dubrow re Kasmer claim.	1.20	
9/17/2003	LEEBOVE, LISA	Telephone conference with I. Kasmer and P. Dubrow; follow-up telephone conference with P. Dubrow.	0.50	
9/25/2003	RATNER, MORRIS	Call Shari Reig re notice on interim report.	0.50	
9/29/2003	RATNER, MORRIS	Review notice issues.	1.00	
9/30/2003	RATNER, MORRIS	Review draft allocation proposal by Special Master; draft notice proposal re same; email to S. Reig and Burt Neuborne.	3.00	
10/2/2003	RATNER, MORRIS	Conference with Reig re filing and coverage from car.	0.20	
10/6/2003	RATNER, MORRIS	Edit Reig draft allocation notice; comments to Reig re same.	1.50	
10/7/2003	RATNER, MORRIS	Review latest draft notice; conference with S. Reig.	2.00	
10/8/2003	RATNER, MORRIS	Conference with S. Reig re notice; conference with J. Menard; conference with B. Neuborne.	2.00	
10/9/2003	RATNER, MORRIS	Conference with B. Neuborne re notice; conference with S. Reig re same.	1.00	
10/13/2003	RATNER, MORRIS	Notice issues re allocation proposal; conference with IOM and CCI; mail notice.	1.50	
10/14/2003	RATNER, MORRIS	Edit Neuborne press release.	1.00	
10/15/2003	RATNER, MORRIS	Conference with K. Kinsella re notice and budget.	1.00	
10/22/2003	RATNER, MORRIS	Conference with Kinsella re press.	0.30	

EXHIBIT B

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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Timekeeper: ALL **To** Present

0556-0001 SWISS BANKS - General Matter

Date	Timekeeper	Narrative	Hours	Task Code
10/27/2003	RATNER, MORRIS	Email to Kinsella re press drop.	0.10	
10/28/2003	RATNER, MORRIS	Conference with Kinsella re notice.	0.10	
11/4/2003	RATNER, MORRIS	Review Swift document.	0.10	
11/9/2003	RATNER, MORRIS	Edit Kinsella report; forward changes.	0.50	
11/17/2003	RATNER, MORRIS	Conference with Judah Gribbetz re notice.	0.50	
11/18/2003	RATNER, MORRIS	Serve order re allocation; conference with Dubbin.	0.50	
11/20/2003	RATNER, MORRIS	Email Dubbin.	0.10	
12/9/2003	RATNER, MORRIS	Respond to Neuborne memo on incentive payments; review DRA draft; call to Lambda.	1.00	
12/19/2003	RATNER, MORRIS	Draft and serve Notice of Entry of Order.	1.00	
1/6/2004	RATNER, MORRIS	Conference with Burt Neuborne via email re various.	0.50	
1/9/2004	RATNER, MORRIS	Conference with Burt Neuborne via email re briefing.	0.10	
1/12/2004	RATNER, MORRIS	Conference with Mark Cohen re Swiss re claims notice.	0.30	
1/12/2004	RATNER, MORRIS	Review Burt Neuborne memo re publication of names; emails to Burt Neuborne; respond to S. Reig "opt out" email.	1.50	
1/14/2004	BECKER, CARYN	Communicate with M. Ratner, S. Reig re claimant; review pleadings.	0.50	
1/15/2004	RATNER, MORRIS	Review Burt Neuborne declaration; email to B. Neuborne re same.	0.50	
1/20/2004	RATNER, MORRIS	Conference with Jerry Benjamin.	0.10	
2/9/2004	RATNER, MORRIS	Notice issues on insurance.	0.50	
2/10/2004	RATNER, MORRIS	Meeting at World Jewish Congress.	1.00	
2/17/2004	RATNER, MORRIS	Conference with Moritz at Poorman re notice filing.	0.10	
2/18/2004	RATNER, MORRIS	Conference with M. Feldhaus re filing; email to Reig re same.	0.20	
2/19/2004	RATNER, MORRIS	Call with appellee re filing and service.	0.30	
2/20/2004	RATNER, MORRIS	Conference with M. Feldhaus re notice response.	0.20	
3/1/2004	RATNER, MORRIS	Message from S. Reig.	0.10	
3/10/2004	RATNER, MORRIS	Review M. Feldhaus declaration; conference with Bradfield.	1.30	
3/11/2004	RATNER, MORRIS	Review latest order.	0.20	
3/23/2004	RATNER, MORRIS	Conference with Lakados.	0.10	
3/25/2004	RATNER, MORRIS	Organize notice filing.	0.30	
4/3/2004	RATNER, MORRIS	Conference with counsel re allocation.	0.40	
4/5/2004	BECKER, CARYN	Letter to claimant attorney.	0.40	
4/5/2004	RATNER, MORRIS	Conference with Bradfield re Swiss; email Lakados; conference with Burt Neuborne re allocation; conference with Burt Neuborne re DRA.	0.20	

EXHIBIT B

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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Timekeeper: ALL **To** Present

0556-0001 SWISS BANKS - General Matter

Date	Timekeeper	Narrative	Hours	Task Code
4/16/2004	RATNER, MORRIS	Conference with Burt Neuborne re various.	0.10	
4/29/2004	RATNER, MORRIS	Attend allocation hearing.	4.00	
5/1/2004	RATNER, MORRIS	Circulate Notice proposal.	0.10	
5/25/2004	RATNER, MORRIS	Conference with Gideon Taylor re Swiss re implement suggested changes.	0.30	
6/9/2004	BECKER, CARYN	Revise letter to claimants, website; research on dates, etc.	1.10	
6/22/2004	RATNER, MORRIS	Prepare for conference with staff attorney; call Burt Neuborne; conference with same.	2.00	
6/25/2004	RATNER, MORRIS	Call Burt Neuborne.	0.10	
6/30/2004	SHIH, JUNE	Phone call with M. Ratner.	0.20	
6/30/2004	SHIH, JUNE	Research Cy Pres for Holocaust litigation.	6.00	
7/1/2004	SHIH, JUNE	Research cy pres; memo drafting.	4.00	
7/2/2004	RATNER, MORRIS	Call Staff Attorney re schedule.	0.10	
7/2/2004	SHIH, JUNE	Draft memo on cy pres.	3.00	
7/6/2004	SHIH, JUNE	Cy pres memo - research and drafting.	6.00	
7/7/2004	SHIH, JUNE	Cy pres memo - research and drafting.	1.00	
7/19/2004	RATNER, MORRIS	Conference with staff re notice exhibits.	0.90	
7/20/2004	BEHRMANN, DAWN	Find a docket and pleading on Pacer.	0.20	
7/20/2004	RATNER, MORRIS	Conference with L. Scott re appendix document; conference with appellants re same; conference with Vikram Sidhu re PTC; telephone conference with K. Knestrick re DRA/notice; conference with B. Neuborne re appeals.	1.20	
7/21/2004	RATNER, MORRIS	Draft opposition to extend time on appeal; locate appendix documents; file brief.	3.60	
7/23/2004	RATNER, MORRIS	Conference with Gribbetz re appellate deadlines; review new motion; organize supplemental appendix documents.	1.20	
7/26/2004	BECKER, CARYN	Appeal.	0.20	
7/30/2004	BECKER, CARYN	Communicate with M. Ratner, Burt Neuborne re motion; research same.	1.50	
7/30/2004	RATNER, MORRIS	Conference with C. Becker re appeal process.	0.10	
8/2/2004	BECKER, CARYN	Motion for Consolidation, Enlarged Brief; communicate with M. Ratner, Burt Neuborne re same.	2.30	
8/2/2004	ELGART, ALLISON	Research on timeliness issues for Swiss Banks.	6.50	
8/2/2004	RATNER, MORRIS	Conference with C. Becker re motion on record and page limits.	0.30	
8/3/2004	BECKER, CARYN	Communicate with M. Ratner and communicate with counsel re appeals.	0.80	
8/3/2004	ELGART, ALLISON	Research settlement allocations and timeliness of appeals for M. Ratner.	6.50	
8/3/2004	ELGART, ALLISON	Talk to M. Ratner re Swiss Banks research.	0.30	
8/3/2004	RATNER, MORRIS	Conference with C. Becker re motion; conference with A. Elgart (summer clerk) re research; conference with C. Becker re projects.	0.50	
8/4/2004	BECKER, CARYN	Appellate motions.	1.00	

EXHIBIT B

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Date	Timekeeper	Narrative	Hours	Task Code
8/5/2004	BECKER, CARYN	Motion; communicate with M. Ratner re same.	0.80	
8/5/2004	RATNER, MORRIS	Edit appeal motion.	0.50	
8/6/2004	BECKER, CARYN	Finalize/file motion; communicate with M. Ratner, L. Scott, court, printing service re same.	3.00	
8/9/2004	BECKER, CARYN	Appellate filing issues.	0.50	
8/16/2004	BECKER, CARYN	Communicate with co-counsel, defense counsel re appeal.	0.60	
8/17/2004	BECKER, CARYN	Draft Notice of Withdrawal of Motion for Consolidated Brief; communicate with M. Ratner, D. Sturman re appeals.	1.10	
8/18/2004	BECKER, CARYN	Communicate with D. Miller re printing of Appendix/brief.	0.10	
8/19/2004	RATNER, MORRIS	Conference with B. Neuborne and D. Sturman re appendix; conference with Dubbin re same.	1.00	
8/23/2004	RATNER, MORRIS	Conference with D. Sturman re appeal; review Swift brief; conference with B. Neuborne re appeal; conference with 2d Circuit clerk re captions.	0.70	
9/9/2004	RATNER, MORRIS	Email Ed Lakados; notice filing to Sturman; circulate 2d Circuit orders.	0.20	
11/22/2004	RATNER, MORRIS	Schedule calls re notice, with Lakados and Schneider.	0.20	
11/29/2004	RATNER, MORRIS	Notice issues.	0.30	
12/6/2004	RATNER, MORRIS	Notice issues.	0.30	
12/9/2004	RATNER, MORRIS	Conference with Shari Reig.	0.10	
12/21/2004	RATNER, MORRIS	Edit notice documents for 900+ names.	0.40	
1/4/2005	RATNER, MORRIS	Prepare notice filing; conference with Schneider by email and phone; conference with Burt Neuborne re 3000 names.	1.00	
1/5/2005	RATNER, MORRIS	Notice of motion - draft.	0.50	
1/7/2005	RATNER, MORRIS	Swiss Banks: Confer with G. Schneider re notice (re 36 names).	0.20	
1/10/2005	RATNER, MORRIS	Finalize notice filing.	2.00	
5/5/2005	RATNER, MORRIS	Holocaust: Respond to class member.	0.10	
		Total Hours	**243.50**	

EXHIBIT B

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
SWISS BANKS (0556-0001)
CASE COST RECAPITULATION
JULY 11, 2002 THRU MARCH 13, 2006

Computer Research	11,912.38
Experts/Consultants	3,000.00
Fax	1,027.00
Federal Ex/Messenger	1,595.99
In-House Copies	4,665.40
Outside Copy Service	1,808.30
Postage	372.24
Telephone	1,433.07
Travel	1,205.00
Total:	**$ 27,019.38**

EXHIBIT C